

# BORRELLI & ASSOCIATES

P.L.L.C.

www.employmentlawyernewyork.com

655 Third Avenue  
Suite 1821  
New York, NY 10017  
Tel. No. 212.679.5000  
Fax No. 212.679.5005

1010 Northern Boulevard  
Suite 328  
Great Neck, NY 11021  
Tel. No. 516.248.5550  
Fax No. 516.248.6027

March 9, 2015

Via Fax and ECF

The Honorable George B. Daniels  
United States District Judge for the  
Southern District of New York  
500 Pearl Street  
New York New York 10007  
Fax: (212) 805-6737

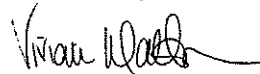
Re: *Rafael Mota v. Bruckner Forever Young Social Adult Day Care Inc, et al.*;  
Docket No. 15-CV-00064

Dear Judge Daniels:

This office represents the Plaintiff, Rafael Moto, in the above-referenced matter. As Your Honor is aware, an Initial Pretrial Conference is scheduled for tomorrow, Tuesday, March 10, 2015, at 9:30 a.m. However, even though all four Defendants in this matter have been served, no one has appeared or responded thus far. (The Affidavits of Service for the Summons and Complaint as well as the Proposed Pretrial Order have already been docketed, and the time to respond expires on March 18.) As such, we respectfully request that Your Honor adjourn the Initial Pretrial Conference for three weeks, until March 31, 2015, by which time we will have filed the necessary default judgment paperwork in the hopes that Your Honor can convert the initial conference into a default judgment hearing in the event that some or all of the Defendants have still failed to appear by that time.

We thank the Court for its attention to this matter.

Respectfully,



Vivian Walton, Esq.

VW:amm